



U.S. Department of Justice  
United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

October 5, 2020

**By ECF**

The Honorable Katherine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**SO ORDERED:**

*Katherine H. Parker*  
**HON. KATHARINE H. PARKER**  
**UNITED STATES MAGISTRATE JUDGE**

10/06/2020

Re: *Debra Early-King v. United States*, 18 Civ. 142 (KHP)

Dear Judge Parker,

This Office represents the United States, the defendant in the above-referenced Federal Tort Claims Act case in which trial is set to begin on November 16, 2020. Although the Government was not intending to file any motions *in limine*, which are due today, Plaintiff made a production of a selection of photographs for the first time in this matter on Friday afternoon that may necessitate motion practice. The parties are conferring about a possible resolution to a dispute over these photographs. To allow additional time for negotiation of a resolution, the Government respectfully requests a one week extension of the motions *in limine* filing deadlines. Plaintiff consents to this request.

Thank you for your consideration of this matter.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By:

/s/ Stephen Cha-Kim  
STEPHEN CHA-KIM  
JENNIFER JUDE  
Assistant United States Attorneys  
(212) 637-2768, -2663  
stephen.cha-kim@usdoj.gov  
jennifer.jude@usdoj.gov